

Before the  
Federal Communications Commission  
Washington, D.C. 20554

In the Matter of	)	
	)	
Coastal Community Action, Inc.	)	CC Docket No. 02-6
In the Schools and Libraries Program	)	

REQUEST FOR WAIVER OF 471 APPLICATION AND ITEM 21 DEADLINE

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Coastal Community Action, Inc., BEN 16055358

FCCRN: 0019770171

470: 170078561 (Coastal\_Community\_Action\_Wireless\_Voice\_Mobile Form 470)

471: 171045173 (Category 1 for CCA\_Wireless\_Voice\_Mobile471)

**FRN 1799111324: Voice/Interconnected VoIP/Install, Activation and configuration**

**FRN 1799111338: Voice, Cellular Voice including Data and/or Text Msg.**

Coastal Community Action, Inc. (CCA), a small, poor, urban Non-Profit 501(c)(3) Community Action serving Head Start and NC Pre K schools in North Carolina (90% E-rate discount), respectfully requests a waiver of the 2017-18 471 Form application and Item 21 deadline.

CCA was waiting on a modified quote for voice and VoIP Services from a few vendors (under the Form 470 contracts) along with having technical difficulties with the USAC portal when attempting to upload the Item 21 template for a quote for Interconnected VoIP Services during the 471 Form open window period. While uploading the properly validated Item 21

template during the open window period the USAC portal continued to send notification that the Item 21 template was not properly validated (template had no missing data, there was no clicking in cells, tables, columns after form was validated) when the window closed on Thursday, May 11, 2017.<sup>1</sup> CCA had submitted a USAC case during the open window period to receive some assistance and when little time was remaining manually entered, the Item 21 items to get the 471 Form submitted and wait for a response.

CCA had two 471 Forms to submit during the open window in category I & II, we went ahead, created, and manually entered line items for the second 471 Form while waiting for assistance from USAC on the first 471 Form. When we did not receive assistance from USAC to assist us during the upload we manually entered the line items for the other 471 Form and submitted. We worked hard with vendors to receive accurate quotes in a timely fashion that included all the relevant information but it is out of the control of the agency when a vendor decides to send their documentation, and of course, CCA had to wait to file the 471 until they had some proof of their request. The documentation and updated quotes from Encore Technology Group, LLC SPIN 143037077 and United States Cellular Corporation SPIN 143011191, came on Thursday, May 11, 2017.

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<sup>1</sup> NCDPI is aware of the issues trying to upload the Item 21 template, along with submitting a case through the USAC portal during the open window period to resolve the issue.

Only after the window, did CCA receive notification 471 Form Category I & II 471 Forms registered as being filed outside of the window period. CCA submitted USAC case through their portal in order to obtain assistance, as the forms appeared to have submitted during the open window. CCA then contacted our State E-rate Coordinator, Jeannene Hurley, notifying CCA had submitted in the EPC portal, within the 14-day grace period. We are filing this request today because we are unsure of when we will receive an actual OOW – Out Of Window Letter. We understand that all documents for 2017 and forward will be in the portal, but we do not know when we will receive the OOW.

Thank you very much for your support in granting this request for waiver of the filing deadline of May 11, 2017, and we look forward to another year of installs, using the state support of the non-discounted portion to update our infrastructure in transitioning to digital teaching and learning.

Respectfully submitted this 15th day of May 2017.

Sandie Tokheim, IT Director  
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